

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

No. 1:22mj02513 Becerra

UNITED STATES OF AMERICA,

v.

TEODOSIO PABON-CONTRERAS,
a/k/a "El Profe,"

Defendant.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia Valle)? ___Yes XNo
2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? ___Yes XNo
3. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? ___Yes XNo

Respectfully submitted,

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

By:


Frederic C. Shadley
Assistant United States Attorney
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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

TEODOSIO PABON-CONTRERAS,
a/k/a "El Profe,"

Defendant(s)

Case No. 1:22mj02513 Becerra

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2021 - October 5, 2021 in the country of Colombia, and elsewhere,
the Defendant violated:

Offense Description

21 U.S.C. § 963

Conspiracy to distribute five kilograms or more of cocaine, knowing, intending
and having reasonable cause to believe they would be unlawfully imported
into the United States.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.



Complainant's signature

Special Agent Steven Catherman, FBI

Printed name and title

Attested to in accordance with the requirements of
Federal Rule of Criminal Procedure 4.1 by Telephone.

Date: 3/28/22

City and state: Miami, FL



Judge's signature

Hon. Jacqueline Becerra, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Steven Catherman, being duly sworn, hereby depose and state the following:

1. I am currently assigned as a Special Agent with the Federal Bureau of Investigation (FBI) in Miami, Florida and have worked in this capacity since May 2016. Prior to becoming an FBI Agent, I worked as a police Officer with the Tullytown Borough Police Department and the Abington Township Police Department from 2006-2016. I have worked in law enforcement for a total of 16 years. My official FBI duties include investigating criminal violations of federal narcotics laws. I have also been involved in various types of visual and electronic surveillances, and I have been involved in the debriefing of defendants, witnesses, informants, and others who have knowledge of the distribution and transportation of controlled substances, and of the laundering and concealing of proceeds from drug trafficking. I am familiar with the ways in which drug traffickers conduct their business, including but not limited to their methods of importing and distributing narcotics. As a law enforcement officer within the meaning of Section 2510(7) of Title 18, United States Code, I am empowered by law to conduct investigations of and make arrests for, but not limited to, offenses enumerated in Titles 18, 21 and 46 of the United States Code.

2. This Affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint against Teodosio PABON-CONTRERAS, a/k/a "El Profe," for conspiring to distribute five kilograms or more of cocaine, knowing, intending or having reasonable cause to believe it would be unlawfully imported into the United States, in violation of Title 21, United States Code, Section 959(a), all in violation of Title 21, United States Code, Section 963.

3. The statements contained in this Affidavit are based on my personal knowledge,

my training and experience, and information provided to me by other law enforcement officials and civilian witnesses. I have not included in this Affidavit each and every fact and circumstance known to me, but only the facts and circumstances that are sufficient to establish probable cause for the criminal complaint sought. As such, it does not include everything I know about this investigation

PROBABLE CAUSE

4. In or around June 2020, FBI Miami initiated an investigation targeting the network of a Colombian drug trafficker located in Cartago, Colombia (“Trafficker 1”). The investigation revealed that Trafficker 1 was a member of a criminal organization based in Cartago, Colombia, that trafficked ton-quantity loads of cocaine from Colombia via airplane, with an ultimate destination in the United States.

5. In or around October 2020, the FBI conducted a joint operation with the DEA and the Colombian National Police in which over 1,000 kilograms of cocaine was seized in Cartago, Colombia. The investigation revealed that the cocaine belonged to Trafficker 1 and his organization, and that they had conspired to send the cocaine from Colombia to Guatemala, with an ultimate destination in the United States. Trafficker 1 was later interviewed by law enforcement and admitted to his role in that conspiracy. Trafficker 1 was indicted by a Grand Jury in the United States for drug trafficking crimes. A provisional arrest warrant was issued for Trafficker 1 in Colombia, and he was arrested by law enforcement in Colombia on or about October 4, 2021.

6. After his arrest, Trafficker 1 agreed to cooperate with law enforcement, and provided the location information for a farm outside of Cartagena where he had an additional

several hundred kilograms of cocaine buried. Subsequent investigation revealed that Trafficker 1 and PABON-CONTRERAS were conspiring to fly that cocaine from Cartagena to Costa Rica, with an ultimate destination in the United States. Trafficker 1 provided specific coordinates for the small farm outside of Cartagena where the cocaine was buried. On or about October 5, 2021, the Colombian National Police arrived at the farm and recovered 15 large plastic bags that contained approximately 362 brick-shaped objects that later tested positive for cocaine. Each brick was consistent in size with roughly one kilogram of cocaine. The individual kilograms were marked with different stamps or pictures, including some with the words “TOY,” “GOOL,” and “KIA.” All of the individual kilograms were field-tested, and returned a positive indication for the presence of cocaine.

7. Trafficker 1 was later interviewed by law enforcement, and he was asked about the 362 kilograms of cocaine located at his farm outside of Cartagena. Trafficker 1 confirmed to law enforcement that PABON-CONTRERAS was one of the owners of that cocaine.

8. In March 2022, PABON-CONTRERAS was interviewed by law enforcement in Colombia and provided the following information. According to PABON-CONTRERAS, his involvement with the cocaine located in Cartagena began in or around August 2021. During that time period, PABON-CONTRERAS met with Trafficker 1 to discuss narcotics trafficking. Also present at that meeting was a member of the Colombian military who worked with Trafficker 1 to ship cocaine north through transit countries to the United States. Trafficker 1 told PABON-CONTRERAS that he wanted to build a resort in Cartagena with a clandestine airstrip, in order to transport cocaine from Colombia to Costa Rica, and from Costa Rica to the United States. Trafficker 1 asked PABON-CONTRERAS for help completing this project to build the airstrip

and transport cocaine to the United States. PABON-CONTRERAS agreed to help. In exchange, Trafficker 1 told PABON-CONTRERAS that he would be paid a to-be-determined amount in United States dollars after a successful cocaine delivery to the United States.

9. Following that meeting, PABON-CONTRERAS introduced Trafficker 1 to local businessmen and politicians in the area that could help him get the required permits to complete the construction project. Trafficker 1 also began to look for: (1) someone to supply him with the needed cocaine; and (2) a farm around Cartagena where he could store the cocaine. PABON-CONTRERAS helped Trafficker 1 find a farm by putting Trafficker 1 in touch with a contact who could rent a farm where the cocaine could be stored. Trafficker 1 later rented the farm from that contact, which was the same farm where the 362 kilograms of cocaine were recovered.

10. In or around September 2021, Trafficker 1 met at his home in Cartagena with PABON-CONTRERAS, a Major in the Colombian National Police, and an individual who used the alias "El Mono." El Mono indicated he had cocaine available for sale, but it was currently far away. Trafficker 1 told El Mono to transport the cocaine from to the farm in Cartagena. From there, Trafficker 1 told all of those present that the cocaine would be flown to Costa Rica and then to the United States. PABON-CONTRERAS later heard a conversation between Trafficker 1 and a co-conspirator that the amount of the cocaine to be delivered from Cartagena to Costa Rica and then to the United States was going to be approximately 1,500 kilograms. According to PABON-CONTRERAS, that co-conspirator was going to be the pilot that transported the cocaine.

11. In or around October 2021, right before Trafficker 1 was captured, PABON-CONTRERAS accompanied two workers to the farm that was going to store the kilograms of cocaine, in order to help prepare the farm to bury the cocaine. Later, the cocaine arrived in three

separate deliveries. PABON-CONTRERAS was present at a nearby store when the trucks containing the cocaine arrived at the farm. El Mono was responsible for completing the transport. PABON-CONTRERAS explained that he was unsure of the exact amount of cocaine that arrived.

12. According to PABON-CONTRERAS, after Trafficker 1 was captured by the Colombian National Police, he met with El Mono and the CNP Major to determine what they should do with the cocaine. El Mono told PABON-CONTRERAS that law enforcement had already seized an unknown amount of cocaine marked with the word “TOY,” and that this was the cocaine that Trafficker 1 planned to send to send from Colombia to Costa Rica to the United States.

13. During his time working with Trafficker 1, PABON-CONTRERAS was paid 10 million Colombian pesos, or approximately \$2,633 at current exchange rates. This amount served as payments for PABON-CONTRERA’s expenses in coordinating the logistics of the Cartagena cocaine delivery. However, PABON-CONTRERAS explained that he expected to be paid a much larger amount in US Dollars after the successful delivery of the cocaine to the United States.

[Intentionally Blank]

Conclusion

14. Based on the foregoing facts, I submit that probable cause exists to believe that Teodosio PABON-CONTRERAS, a/k/a "El Profe," conspired to distribute five kilograms or more of cocaine, knowing, intending or having reasonable cause to believe it would be unlawfully imported into the United States, in violation of Title 21, United States Code, Section 959(a), all in violation of Title 21, United States Code, Section 963.

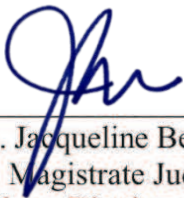
FURTHER YOUR AFFIANT SAYETH NAUGHT.



Steven Catherman
Special Agent
Federal Bureau of Investigation

Attested to in accordance with the requirements of
Federal Rule of Criminal Procedure 4.1 by Telephone.

This 28th day of March, 2022.



Hon. Jacqueline Becerra
U.S. Magistrate Judge
Southern District of Florida